

### **REMARKS**

By this Amendment, Claims 51-53 are cancelled herein. Claims 2, 17, 27, and 42 have been amended herein. Amendments to the claims are made without acquiescence to the position of the Office Action or prejudice to pursue the claims, as originally filed, in a continuation application. No new claims are added. Hence, Claims 2, 3, 5-13, 17-25, 27, 28, 30-38, and 42-50 are pending.

### **FILED IDS HAS NOT BEEN ACKNOWLEDGED**

The Applications have not yet received an initialed form PTO-1449 acknowledging the receipt and consideration of the information disclosure statement (IDS) filed February 2, 2005 (“the February IDS”). Consequently, the Applicants respectfully request an initialed form PTO-1449 acknowledging the receipt and consideration of the February IDS.

### **SUMMARY OF REJECTIONS**

Claims 2-3, 6-13, 17-18, 20-25, 27-28, 31-38, 42-43, and 45-53 are rejected under 35 USC §103(a) as allegedly anticipated by U.S. Patent No. 6,185,587 issued to Bernardo et al. (“*Bernardo*”) in view of U.S. Patent Application No. 2003/0058277 by Bowman-Amuah et al. (“*Bowman-Amuah*”).

Claims 5, 19, 30, and 44 are rejected under 35 USC §103(a) as allegedly unpatentable over *Bernardo* in view of *Bowman-Amuah* in view of U.S. Patent No. 6,748,569 issued to Brooke et al. (“*Brooke*”).

The rejections are respectfully traversed.

## THE PENDING CLAIMS ARE PATENTABLE OVER THE CITED ART

Each of the pending claims recites a combination of elements that is not disclosed, taught, or suggested by the cited art, either individually or in combination. Each of the pending claims shall be discussed below.

### Claim 2

Claim 2 recites the following features:

A method of building a web site, the method comprising the steps of:  
presenting a user with a series of one or more user interfaces including controls for modifying a template that defines a first arrangement of components for a template web site;  
receiving input from the user in response to user interaction with the controls on the series of one or more interfaces;  
creating a user site XML file holding data indicating a modified arrangement of components based on the input from the user;  
causing a web site building component to automatically build the web site based on the user site XML file,  
wherein the web site building component builds the web site by performing the steps of:  
calling routines to create, within a database, database objects for storing and retrieving properties of components, of the web site, that are specified in the user site XML file, and  
calling routines to load information from the user site XML file into said database objects;  
in response to receiving a request, from a requestor, for a requested web site page of the web site, determining access privileges for the requestor; and  
executing a routine to dynamically assemble the requested web page of the web site, based on the database objects and the access privileges for the requestor, in response to receiving a request, from the requestor, for the requested web page,  
wherein each web page of the web site is stored in an unassembled form in the database. (emphasis added).

The above-combination of elements are not disclosed, taught, or suggested, either individually or in combination, by *Bernardo* or *Bowman-Amuah*.

*Bernardo* teaches an approach for creating a web site wherein a user is presented with a view that allows the user to select the desired features of the web site. Thereafter, a tool identifies which templates (“the selected templates”) in a library of stored templates are

associated with the selected desired features. The user may be prompted for certain data from the user to personalize the templates. Thereafter, the selected templates are populated with the data collected from the user to create the web pages of the web site. The created web site may then be forward to a server, so that the web site may be approved, and thereafter served to a requestor upon request (See FIG. 3 and the corresponding description in Col. 7, line 1 to Col. 8, line 33).

Significantly, the approach of *Bernardo* (a) modifies web page templates to create the web pages of the web site, so that the web pages of the web site are created before any request for the web page is received, and (b) creates a web page that is served to every requestor of the web page, regardless of the identity of the actual requestor. Consequently, numerous elements of Claim 2 are not disclosed, taught, or suggested by *Bernardo*.

Specifically, the element of “in response to receiving a request, from a requestor, for the requested web site page of the web site, determining access privileges for the requestor” is not shown by *Bernardo*. For example, the Applicant’s specification teaches determining the access privileges of a requestor of a web page. The access privileges of a requestor may be used in creating a particular component of a particular web page, when the requested web page is assembled, to allow certain users the ability to perform certain actions using the particular component of the particular web page, while preventing other users the ability to perform those actions using the same particular component (See, *inter alia*, page 91, lines 10-21).

In sharp contrast, *Bernardo* does not teach determining the access privileges of a requestor of a web page. Indeed, *Bernardo* teaches that the same web page is served to every requestor of the web page, regardless of the identity of the actual requestor (see Col. 8, lines 7-32). Thus, there would be no need for the approach of *Bernardo* to determine the access privileges of the requestor, since the access privileges of the requestor is neither used by

*Bernardo* in creating the web page nor serving the web page. Consequently, it is respectfully submitted that this element is not shown, taught, or suggested by *Bernardo*.

Another important distinction between the approach of *Bernardo* and Claim 2 is featured in the element of “executing a routine to dynamically assemble a requested web page of the web site, based on the database objects and the access privileges for the requestor, in response to receiving a request, from the requestor, for the requested web page, wherein each web page of the web site is stored in an unassembled form in the database.” In the approach of *Bernardo*, web pages are created in step 22 of FIG. 3, which is long before any request is received for the web page. Since the approach of *Bernardo* involves populating HTML template web pages with data supplied by a user, once the template web pages are populated, the web pages of the web site are created. Thus, the approach of *Bernardo* creates the web pages of a web site prior to any request for a particular web page of the web site. Further, as explained above, *Bernardo* does not teach assembling a web page based on the access privileges of the requestor. Consequently, it is respectfully submitted that this element is not shown, taught, or suggested by *Bernardo*.

*Bowman-Amuah* fails to cure the deficiencies of the teaching of *Bernardo* discussed above with respect to the elements of Claim 2. As a result, numerous elements of Claim 2 are not disclosed, taught, or suggested by either *Bernardo* or *Bowman-Amuah*. Accordingly, it is respectfully submitted that Claim 2 is patentable over *Bernardo* and *Bowman-Amuah*, either individually or in combination.

#### Claims 3, 5-13, 27, 28, and 30-38

Independent Claim 27 recites features similar to those discussed above with respect to Claim 2, except that Claim 27 is recited in computer-readable medium format. Consequently, it is respectfully submitted that Claim 27 is patentable over the cited art for at least the reasons

given above with respect to Claim 2.

Claims 3, 5-13, 28, and 30-38 are dependent claims, each of which depends (directly or indirectly) on one of the claims discussed above. Each of Claims 3, 5-13, 28, and 30-38 is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of Claims 3, 5-13, 28, and 30-38 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

#### Claim 17

Claim 17 recites the following features:

A method of building a web site, the method comprising the steps of:  
creating a first data structure holding data indicating one or more adjustable properties of one or more components for a page for the web site;  
presenting a user with a series of one or more user interfaces including controls for determining one or more values corresponding to the one or more adjustable properties;  
receiving user input indicating the one or more values in response to user interaction with the controls on the series of one or more interfaces; and  
in response to the user input, automatically performing the step of building the one or more components in the web site based on the one or more values;  
wherein said step of building the one or more components in the web site includes translating data in a second data structure to commands to cause creation, within a database system, of one or more database objects to support the one or more components,  
wherein each database object, of the one or more database objects, supports a particular component of the one or more components, wherein each database object, of the one or more database objects, includes a first stored procedure and a second stored procedure, wherein execution of the first stored procedure causes the particular component to be rendered in a manner that allows the user to perform a first set of actions using the particular component, wherein execution of the second stored procedure causes the particular component to be rendered in a manner that allows the user to perform a second set of actions using the particular component, wherein the first set of actions is different from the second set of actions,

wherein the first stored procedure requires that the requestor possess a different set of access privileges to be executed than the second stored procedure, and

wherein said step of building the component in the web site further comprises translating data in the second data structure to commands to cause creation of the database, before causing creation of the one or more database objects.

(emphasis added).

The above-combination of elements are not disclosed, taught, or suggested, either individually or in combination, by *Bernardo* or *Bowman-Amuah*.

As discussed above, there are significant differences between the approach of *Bernardo* and the approach of the pending claims. For example, the elements of “wherein each database object, of the one or more database objects, supports a particular component of the one or more components, wherein each database object, of the one or more database objects, includes a first stored procedure and a second stored procedure, wherein execution of the first stored procedure causes the particular component to be rendered in a manner that allows the user to perform a first set of actions using the particular component, wherein execution of the second stored procedure causes the particular component to be rendered in a manner that allows the user to perform a second set of actions using the particular component, wherein the first set of actions is different from the second set of actions, wherein the first stored procedure requires that the requestor possess a different set of access privileges to be executed than the second stored procedure” is not shown by *Bernardo*.

Rather than showing the above element, the approach of *Bernardo* teaches that web pages, once created, are served the same way to each requestor, regardless of the access privileges associated with the requestor. Further, there is no suggestion in *Bernardo* of a database object, supporting a particular component of a web page, that contains a stored procedure that, when executed, causes the particular component being supported by the database object to be rendered in a manner that allows the user to perform a set of actions using the

particular component. Consequently, it is respectfully submitted that this element is not shown, taught, or suggested by *Bernardo*.

*Bowman-Amuah* fails to cure the deficiencies of the teaching of *Bernardo* discussed above with respect to the elements of Claim 17. As a result, numerous elements of Claim 17 are not disclosed, taught, or suggested by either *Bernardo* or *Bowman-Amuah*. Accordingly, it is respectfully submitted that Claim 17 is patentable over *Bernardo* and *Bowman-Amuah*, either individually or in combination.

#### Claims 18-25 and 42-50

Independent Claim 42 recites features similar to those discussed above with respect to Claim 17, except that Claim 42 is recited in computer-readable medium format. Consequently, it is respectfully submitted that Claim 42 is patentable over the cited art for at least the reasons given above with respect to Claim 17.

Claims 18-25 and 43-50 are dependent claims, each of which depends (directly or indirectly) on one of the claims discussed above. Each of Claims 18-25 and 43-50 is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of Claims 18-25 and 43-50 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

## CONCLUSION

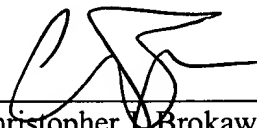
The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to Deposit Account No. 50-1302.

Respectfully submitted,

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### CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: **Mail Stop Amendment**, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 2213-1450.

on June 8, 2005

by

  
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Angelica Maloney